

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA

APPENDIX D



Filed at

11:15 A.M.

5/18, 2006

DEPUTY CLERK, U.S. DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA

Deborah Yehudah

Plaintiff

v.

Civil Action No:

3:06-cv-41 (CAR)

University of Georgia

Defendant(s)

COMPLAINT

1. Defendant is a citizen of the United States and resides at THE University of Georgia c/o Human Resources Bldg, 215 Jackson St.
2. Defendant(s) names(s) Rachel Hammond

Location of principal office(s) of the named defendant(s) THE University of Georgia c/o Human Resources Bldg, # 215 Jackson St. Rachel Hammond

Nature of defendant(s)' business Education

Approximate number of individuals employed by defendant(s) \_\_\_\_\_

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 2000e-5(g).
4. The acts complained of in this suit concern:
  - (A) \_\_\_\_\_ Failure to employ me.
  - (B) ☒ Termination of my employment.

- (C) \_\_\_\_\_ Failure to promote me.  
(D) \_\_\_\_\_ Other Acts as specified below:

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5. Plaintiff is:

- (A) \_\_\_\_\_ presently employed by the defendant(s).  
(B) ☒ not presently employed by the defendant(s).

The dates of this employment were \_\_\_\_\_

Employment was terminated because:

- (1) ☒ plaintiff was discharged.  
(2) \_\_\_\_\_ plaintiff was laid off.  
(3) \_\_\_\_\_ plaintiff left the job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

- (A) ☒ my race.  
(B) \_\_\_\_\_ my religion.  
(C) \_\_\_\_\_ my sex.  
(D) \_\_\_\_\_ my national origin.  
(E) \_\_\_\_\_ other as specified below:

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7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant(s) company is (are) Rachel

Hammond

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8. The alleged discrimination occurred on or about September 27, 2005.

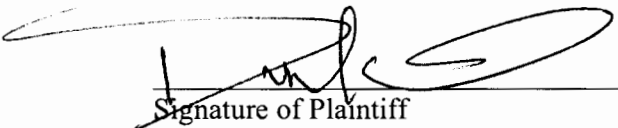
9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is/are as follows:

I believe that my employer discriminated against me, by refusing to reasonably accommodate my religious practices in violation of the Civil

Rights Acts of 1964, as amended. I believe that my employer retaliated against me by terminating me after I complained of religious discrimination. Allowing me to wear my head scarf would have resulted in no hardship to the University because prior to and during the time of my employment other employees in my work area were permitted to wear head coverings.

10. The alleged illegal activity took place at The University of Georgia at the Snelling Dining Hall in Athens Georgia
11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about October 18, 2005. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on May 18, 2005
12. I seek the following relief:
- (A) ☒ recovery of back pay.
  - (B) ☐ reinstatement to my former job or position.
  - (C) ☐ front pay (where reinstatement is not suitable).
  - (D) ☒ damages (damages are recoverable only in age discrimination cases and only for "willful violations" of the Act).
  - (E) ☐ injunctive relief.
  - (F) ☐ expenses and attorney's fees.
  - (G) ☐ other (describe below):

5/18/06  
Date

  
Signature of Plaintiff

Address of Plaintiff:

105 OAK HILL DRIVE  
Apt # 3333 Athens  
Georgia 30601

Phone Number (770) 374-5067

EEOC Form 161-B (3/98)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Deborah Yahudah  
105 Oak Hill Drive Apt 3333  
Athens, GA 30601

From: Atlanta District Office - 410  
100 Alabama Street, S.W.  
Suite 4R30  
Atlanta, GA 30303



On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR § 1601.7(a))

Charge No.	EEOC Representative	Telephone No.
110-2006-00543	Karen L. Lewis, Investigator	(404) 562-6838

(See also the additional information enclosed with this form.)

## NOTICE TO THE PERSON AGGRIEVED:

**Title VII of the Civil Rights Act of 1964 and/or the Americans with Disabilities Act (ADA):** This is your Notice of Right to Sue, issued under Title VII and/or the ADA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII or the ADA must be filed in federal or state court **WITHIN 90 DAYS** of your receipt of this Notice or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)



More than 180 days have passed since the filing of this charge.



Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of the charge.



The EEOC is terminating its processing of this charge.



The EEOC will continue to process this charge.

**Age Discrimination in Employment Act (ADEA):** You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:



The EEOC is closing your case. Therefore, your lawsuit under the ADEA must be filed in federal or state court **WITHIN 90 DAYS** of your receipt of this Notice. Otherwise, your right to sue based on the above-numbered charge will be lost.



The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of your charge, you may file suit in federal or state court under the ADEA at this time.

**Equal Pay Act (EPA):** You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Bernice Williams-Kimbrough,  
Director

FEB 27 2006

(Date Mailed)

Enclosure(s)

cc: Dr. Meredith Thomas  
Chancellor  
BD OF REGENTS OF THE UNIV  
System of Ga  
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